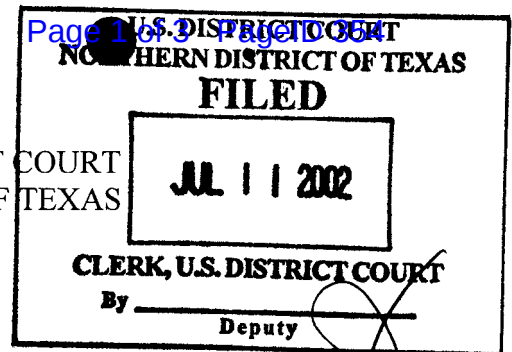


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



JAMAL ELHAJ-CHEHADE,
Plaintiff,

v.

EDUCATIONAL COMMISSION FOR
FOREIGN MEDICAL GRADUATES,
Defendant.

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CIVIL ACTION NO.

3:01-CV-01301-L

**DEFENDANT EDUCATIONAL COMMISSION FOR FOREIGN
MEDICAL GRADUATES' REPLY TO CHEHADE'S
COUNTERMOTION FOR SANCTIONS**

Defendant, EDUCATIONAL COMMISSION FOR FOREIGN MEDICAL GRADUATES ("ECFMG"), in the above-entitled and numbered cause, files this Reply to Chehade's Countermotion For Sanctions. In support thereof, ECFMG would respectfully show this Court as follows:

1. On or about July 9, 2002, Chehade filed "Plaintiff's response to the defendants filing and the plaintiff countermotion for sanction until the plaintiff needs are identified/met." (hereinafter "Chehade's Countermotion"). ECFMG opposes Chehade's Countermotion and ECFMG files this Response to avoid any implication that ECFMG agrees to Chehade's Countermotion by failing to file a response.

2. ECFMG contends that the merits of the relief requested in Chehade's Countermotion have already been presented to this Court in the following motions and their applicable responses all of which are currently pending before this Court:

- a. Chehade's Motion for Summary Judgment.
- b. ECFMG's Motion for Summary Judgment
- c. ECFMG's Motions for Sanctions.

3. ECFMG believes that these filings adequately address the issues presented in Chehade's Countermotion and further briefing will not benefit this Court. Therefore, ECFMG incorporates those pleading herein by reference.

4. ECFMG prays that the Court deny all relief requested by Chehade.

Respectfully submitted,

HENSLEE, FOWLER, HEPWORTH &
SCHWARTZ, L.L.P.

By: 

Susan Abbott Schwartz
State Bar No. 00797900
Mark C. Roberts II
State Bar No. 00788293

6688 N. Central Expressway, Suite 850
Dallas, Texas 75206
(214) 219-8833
(214) 219-8866 – Fax

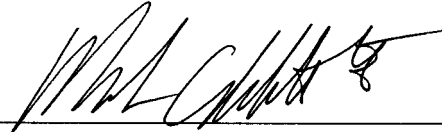
ATTORNEYS FOR DEFENDANT
EDUCATIONAL COMMISSION FOR
FOREIGN MEDICAL GRADUATES

CERTIFICATE OF SERVICE

The undersigned certifies that on this 10th day of July, 2002, a true and correct copy of the above and foregoing document was served upon the following party appearing *pro se* of record via certified mail, return receipt requested:

Jamal Elhaj-Cehade
5414 Cedar Springs, #806
Dallas, Texas 75235
(214) 521-7541

Certified Mail, Return Receipt: 7002 0510 0004 4353 4284



Mark C. Roberts II

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